

Note for Carcich, Claire

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**From:** Smith, Mary Anne  
**Date:** Wed, Mar 15, 1995 9:03 AM  
**Subject:** RE: RI PAC  
**To:** Carcich, Claire; Pontarelli, Jim

204335473D

Claire, the note I have here in the file from RI Campaign Finance Division says "It is not legal in RI for a Corp. to download to a PAC. Any RI candidate receiving a contribution from your PAC will be asked to return it." Therefore, we can't spend it -- at least not on political contributions. Jim, correct me if I'm wrong, but the only money in this account is from the download. We never got around to soliciting funds in any other manner. Sorry this is such a mess. What do we do now?

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From: Carcich, Claire on Tue, Mar 14, 1995 5:45 PM  
Subject: RI PAC  
To: Smith, Mary Anne

In a nutshell, it would be preferable for us to spend the funds remaining in the RI PAC than to try to upload the funds. To upload we would have to be sure no federal funds were co-mingled with state funds (i.e. that the RI PAC did not solicit and receive any funds independent of the PhilPAC download) and perhaps more importantly, it would require an advisory opinion from the FEC since uploads are generally problematic. Let me know if spending the funds is a problem.

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